

From: [Scott R. Grubman](#)
To: [Patrick, Bradford \(USAGAS\)](#)
Subject: [EXTERNAL] Re: Tony Oloans
Date: Friday, March 22, 2024 12:39:21 PM

Bradford,

Sorry about the one document, that's on me. I will get my assistant to Bates it and send it to you ASAP.

Nothing more is forthcoming, as the only other documents that are responsive to your CID are equally accessible to the DOJ as it is to us. As far as the certificates, my client declines to submit based on his 5th Amendment privilege. While I appreciate your treatise on the 5th Amendment, i respectfully disagree and will simply take it up with the Court.

Thanks for the heads up on the enforcement petitions. I will certainly accept service. As a heads up to you, we will be arguing in response that the DOJ is attempting to skirt the 5th Amendment by abusing the CID authority. Wouldn't want you to feel blindsided by that when it comes up, so now you know.

Look forward to hearing from you some more.

Best,

Scott R. Grubman

Chilivis Grubman

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From: Patrick, Bradford (USAGAS) <Bradford.Patrick@usdoj.gov>

Date: Friday, March 22, 2024 at 11:04 AM

To: Scott R. Grubman <SGrubman@cglawfirm.com>

Subject: RE: Tony Oloans

Scott:

Hope all is well. I wanted to follow up on your message below to confirm that your clients do not intend to produce anything further in response to the CIDs issued to them. You'd indicated you'd be producing a document the week of February 8 on behalf of The Prudential Realty but none was produced. We've also not received signed certifications that all documents have been produced, or alternatively can be found on the Secretary of State's website, that are responsive to the CIDs.

I anticipate we will petition the Court to enforce these CIDs. There are several problems with

asserting the Fifth Amendment in these circumstances that include, as you reference, the 100 years of Supreme Court caselaw that corporate entities do not have Fifth Amendment rights and the attempt to blanketly refuse to respond to all interrogatories, irrespective of whether the response would be incriminating. Moreover, Mr. Oloans is only identified on the public filings for a small number of your clients, so it is not at all clear how they could benefit from his invocation, even if the law permitted a company to do that.

Would you also let me know whether you will accept service of a petition to enforce these CIDs?

Thank you,
Brad

Bradford C. Patrick
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From: Scott R. Grubman <SGrubman@cglawfirm.com>

Sent: Friday, February 2, 2024 3:56 PM

To: Patrick, Bradford (USAGAS) <BPatrick@usa.doj.gov>

Subject: [EXTERNAL] Re: Tony Oloans

Bradford,

Thank you for your quick reply. I will note that the case you cite is (a) not in this district; and (b) does not have anything to do with the FCA or CIDs. Accordingly, unless you can point out a case that is relevant to the issue at hand (in which case I would certainly take a look), we will respectfully decline your invitation to produce these publicly-available documents at this time. That being said, I will prepare the one responsive document for production early next week and get that to you.

As for the interrogatories, we are also going to decline to answer those at this time based on Mr. Oloan's 5th Amendment privilege. While I understand that these CIDs are addressed to LLCs, and while I understand that the general law is that LLCs do not have a 5th Amendment privilege, Mr. Oloans does have such a privilege, and he is not going to waive it by answering these CID interrogatories. Moreover, my understanding is that the CIDs were only issued after the DOJ ran into issues on the criminal side with witnesses asserting their privilege before the grand jury. If that's the case, then it could appear to some that these CIDs may have been issued in an attempt to get around those invocations. Obviously that would be an inappropriate use of the CID power.

Please let me know if you have any further questions. Otherwise, I hope you have a nice weekend.

Best,

Scott R. Grubman

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From: Patrick, Bradford (USAGAS) <Bradford.Patrick@usdoj.gov>

Date: Friday, February 2, 2024 at 3:29 PM

To: Scott R. Grubman <SGrubman@cglawfirm.com>

Subject: RE: Tony Oloans

Scott:

Were this a different investigation, I would be more amenable to your approach. But I don't believe public filings are exempt from discovery, particularly where your clients prepared them. See, e.g., *Great Lakes Ins., SE v. Sunset Watersports, Inc.*, 2021 WL 4973079, at *3 (S.D. Fla. Apr. 29, 2021). The best I can do is agree to review the responses your clients ultimately provide and the specificity with which they refer to the responsive documents before taking a position on whether the responses are adequate for our purposes.

I also would appreciate an answer to the question I posed earlier about your timeline for providing the responses to the CIDs issued to your clients.

Thank you,
Brad

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From: Scott R. Grubman <SGrubman@cglawfirm.com>

Sent: Friday, February 2, 2024 2:49 PM

To: Patrick, Bradford (USAGAS) <BPatrick@usa.doj.gov>

Subject: [EXTERNAL] Re: Tony Oloans

Bradford,

I know I said I could if you really needed me to, but honestly, that was more of trying to make a point. I don't think the DOJ should be in the business of asking a company to go on a publicly-available website to print out documents to produce. So, respectfully, I will have to decline your request on the grounds that those documents are equally available to you than to my client. Please let me know if you have any further questions or requests.

Best,

Scott R. Grubman

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From: Patrick, Bradford (USAGAS) <Bradford.Patrick@usdoj.gov>

Date: Friday, February 2, 2024 at 10:18 AM

To: Scott R. Grubman <SGrubman@cglawfirm.com>

Subject: RE: Tony Oloans

Scott:

Thank you for the response and clarification on your client. With apologies for the extra work, we would appreciate production of those documents in the CID response. Do you have a time frame you are contemplating?

Best,
Brad

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From: Scott R. Grubman <SGrubman@cglawfirm.com>

Sent: Thursday, February 1, 2024 3:47 PM

To: Patrick, Bradford (USAGAS) <BPatrick@usa.doj.gov>

Subject: [EXTERNAL] Tony Oloans

Bradford,

Thanks for your patience. I can confirm that I represent Mr. Oloans and the following entities:

Alliance Park
Brickyard Place
Centex Management
Deerwood Pointe
Governors Management
Honey Park
Mariah Marie
Prudential Realty
Union GL Park

For all but one of these entities (Prudential Realty), the only documents that exist are the documents that the entities filed with the Georgia Secretary of State. While we are happy to produce those, I would just be downloading them from the SOS website, so it probably just makes sense for you to access those directly.

For Prudential Realty, the only document is a lease agreement, which I will process for production. Is there anything else that you think we are missing? Otherwise, I think we may only have one document to produce.

Thanks,

Scott R. Grubman

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From: Patrick, Bradford (USAGAS) <Bradford.Patrick@usdoj.gov>

Date: Tuesday, January 23, 2024 at 12:24 PM

To: Scott R. Grubman <SGrubman@cglawfirm.com>

Subject: RE: Bradford Patrick

Scott:

When is a good time to check in with you about the status of the CIDs we've issued? And can you please let me know which entities you represent in connection with our investigation of House of Prayer?

Thanks,
Brad

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From: Patrick, Bradford (USAGAS)
Sent: Wednesday, December 20, 2023 3:19 PM
To: Scott R. Grubman <SGrubman@cglawfirm.com>
Subject: RE: Bradford Patrick

Scott:

Thanks for checking. I do not have a way to know which CIDs would be forwarded to Mr. Oloans in the normal course but it's possible that the following CIDs may also be routed to him:

- House of Prayer Christian Churches of America, Inc. (CID No. 2023-011)
- First Horizon Management Services LLC (CID No. 2023-017)
- JZS Investments LLC (CID No. 2023-018)
- Southern Oasis Property Management LLC (CID No. 2023-020)
- People Helping People Group LLC (CID No. 2023-021)

Would you please let me know whether you represent any or all of the entities you mention in your email?

Hope you are able to take a chance to rest a bit this holiday season

Best,
Brad

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From: Scott R. Grubman <SGrubman@cglawfirm.com>
Sent: Wednesday, December 20, 2023 1:07 PM
To: Patrick, Bradford (USAGAS) <BPatrick@usa.doj.gov>

Subject: [EXTERNAL] Re: Bradford Patrick

Brad,

I hope you are doing well. Following up on our last call, I just wanted to let you know that since our last call, Mr. Oloans has received two additional CIDs, for Centex Management LLC and Alliance Park LLC. This is in addition to the prior CIDs that he received for Brickyard Place LLC, Deerwood Pointe LLC, Governors Management LLC, Honey Park LLC, Mariah Marie LLC, Union GL Park LLC, and Prudential Realty LLC. Can you please confirm that we now have all of the CIDs that were sent out?

Thank you.

Scott R. Grubman

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From: Patrick, Bradford (USAGAS) <Bradford.Patrick@usdoj.gov>

Date: Friday, December 8, 2023 at 1:58 PM

To: Scott R. Grubman <SGrubman@cglawfirm.com>

Subject: RE: Bradford Patrick

Sure. I'm not available from 1:30-3 but otherwise am free. Jennifer Little advised me that you also are representing Honey Park LLC, Deerwood Point LLC, Governor's Management LLC, The Prudential Realty LLC, Brickyard Place LLC, and Mariah Marie LLC. Can you confirm this is accurate?

Best,

Brad

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From: Scott R. Grubman <SGrubman@cglawfirm.com>

Sent: Friday, December 8, 2023 1:53 PM

To: Josephson, Matthew (USAGAS) <MJosephson@usa.doj.gov>; Patrick, Bradford (USAGAS) <BPatrick@usa.doj.gov>

Subject: [EXTERNAL] Re: Bradford Patrick

Thanks Matt. Brad, I have just been retained to represent Tony Oloans in relation to the House of Prayer matter. I am in an all-day CID depo in the NDGA today, but can we talk on Monday? Thank you.

Scott R. Grubman

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From: Josephson, Matthew (USAGAS) <Matthew.Josephson@usdoj.gov>

Date: Friday, December 8, 2023 at 1:51 PM

To: Scott R. Grubman <SGrubman@cglawfirm.com>, Patrick, Bradford (USAGAS) <Bradford.Patrick@usdoj.gov>

Subject: RE: Bradford Patrick

Brad,

Scott wanted to reach out to you about a new matter. Connecting.

Matt

Matthew A. Josephson
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From: Scott R. Grubman <SGrubman@cglawfirm.com>

Sent: Friday, December 8, 2023 1:44 PM

To: Josephson, Matthew (USAGAS) <MJosephson@usa.doj.gov>

Subject: [EXTERNAL] Bradford Patrick

Matt, hope all is well. Can you please put me in touch via email with Bradford? I can't find his email but need to reach out to him on a new matter. Thanks,

Scott R. Grubman

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